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May 19, 1997

DOCKET FILE COPY ORIGINAL

VIA HAND DELIVERY

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Washington D.C. 20554

Re: *MM Docket No. 97-106; RM-9071*
(Cheyenne, Wyoming and Gering Nebraska)

Dear Mr. Caton:

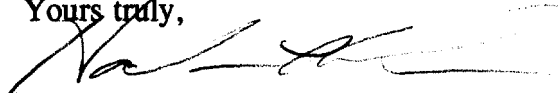
Enclosed please find the Answer to Order to Show Cause and Comments of Tracy Broadcasting Corporation ("Answer") in the above-referenced docket.

In accordance with Commission Rule 1.420, Tracy Broadcasting Corporation ("Tracy") is submitting the Original and four copies of its Answer, and a copy marked "Stamp & Return". Tracy is also providing a copy of the Answer to the petitioner, and a courtesy copy to Ms. McDonald of the Mass Media Bureau.

Please acknowledge receipt of the enclosed Answer by date-stamping the enclosed copy marked "Stamp & Return" and returning it to our courier.

Please contact me with any questions.

Yours truly,



Harsha Krishnan

Enclosure

cc: Elizabeth A. Sims, Esq.
Ms. Sharon P. McDonald
Tracy Broadcasting Corporation

EXECUTED ORIGINAL

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Before the

FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
MAY 19 1997
Federal Communications Commission
Office of Secretary

In the Matter of
Amendment of Section 73.202(b),
Table of Allotments, FM Broadcast Stations.
(Cheyenne, Wyoming and Gering, Nebraska)

MM Docket No. 97-106
RM-9071

**ANSWER TO ORDER TO SHOW CAUSE AND COMMENTS
OF TRACY BROADCASTING CORPORATION**

Tracy Broadcasting Corporation ("TBC"), by and through its attorneys, files this Answer to Order to Show Cause and Comments of Tracy Broadcasting Corporation ("*Answer*") in response to the Commission's March 19, 1997, *Notice of Proposed Rule Making and Order to Show Cause* (DA-97-585) (the "*Notice*"), issued in this proceeding. In support of this *Answer*, TBC states as follows:

INTRODUCTION

1. TBC is a Nebraska corporation which holds licenses for stations KMOR-FM and KOLT(AM), Scottsbluff, Nebraska, KOAQ(AM), Terrytown, Nebraska and KOLT-FM, Gering, Nebraska. TBC also holds the FM Broadcast Station Construction Permit for unbuilt station KASX(FM), Pine Bluffs, Wyoming. In addition, TBC is the only applicant for the vacant FM channel 267C allotted to Bridgeport, Nebraska. *See Application BPH-960506MA*.¹

2. Station KOLT-FM currently operates on channel 280C3, while TBC's permit for unbuilt station KASX specifies operation on channel 287C2. The Commission has allotted channel 267C for Bridgeport, Nebraska.

3. On February 25, 1997, TSB II, Inc. ("TSB II") filed its Petition for Rulemaking and Order to Show Cause (the "*Petition*"), which proposed to allot channel 280C2 to Cheyenne, Wyoming, and substituting channel 293C3 for channel 280C3 at Gering, Nebraska, and modifying station KOLT-FM's license to specify operation on channel 239C3 (the "*Proposal*").

¹TBC applied for this channel under the "first-come, first-served" procedure specified in Commission Rule 73.3564(d)(4).

4. On March 28, 1997, the Commission issued the *Notice* and directed TBC to show cause why its license for station KOLT-FM should not be modified to specify operation on channel 239C3 rather than 280C3. TBC was directed to respond to the *Notice* by May 19, 1997.

5. As the respondent of the *Notice* and as the licensee of KOLT-FM, TBC is an interested party and has standing to respond to the *Proposal* and the *Notice*.

COMMENTS ON THE PROPOSAL

6. TSB II stated that the *Proposal* will add a sixth local FM station to Cheyenne. TSB II's *Petition* asserted that two stations, KKAZ(FM) and KFBQ(FM), were "dark" (*i.e.*, not operating), which left Cheyenne with only three FM stations (*Petition* ¶ 2). TSB II then contended that adding another operating FM station in Cheyenne would create further competition in that sparsely served local radio market and thereby serve the public interest. *Id.*

7. The current Cheyenne FM radio market does not resemble the situation depicted in the *Proposal*. Stations KKAZ(FM) (now KOLZ(FM)) and KFBQ(FM), licensed to Magic City Media, Inc., are currently operating and providing service to the Cheyenne community.² In addition, another pending rulemaking proposes allotting channel 229A to Cheyenne. *Cheyenne, Wyoming*, 61 FR 65509 (December 13, 1996).

8. Thus, there are five operating FM stations in Cheyenne, with an additional FM station proposed to be allotted. TBC observes that Cheyenne is not "sparsely served" but instead has vigorous competition in its local FM radio market. Thus, the public interest is being served by the current FM allotments to Cheyenne, so TBC urges the Commission to deny the *Proposal*.

9. TBC also observes that modifying KOLT-FM to operate on channel 239C3 will be difficult and expensive because KOLT-FM's antenna is side-mounted on one of the directional antennas of station KOLT(AM). With this antenna configuration, modifying the operation of KOLT-FM to a new channel presents atypical circumstances. Changing the typical FM station to operate on a new channel would require replacing the FM antenna and re-tuning the transmitter, which generally can be performed with no interference to other stations' operations.

²Citicasters Co. (a subsidiary of Jacor Communications Company, a major media corporation) has applied to acquire KOLZ(FM) and KFBO(FM) and expects to continue those stations' operations. See BALH-970403G1 and

In contrast, the FM antenna for KOLT-FM is side-mounted on one of the towers for the KOLT(AM) directional antenna system. That tower itself radiates the KOLT(AM) signal and thereby constitutes a component of the KOLT(AM) transmitting antenna system. To avoid interference with the KOLT(AM) signal, the KOLT-FM antenna is specially configured, utilizing an isocoupler, and both the KOLT-FM antenna and the KOLT(AM) antenna system have been extensively tested and adjusted to ensure that no objectionable interference will occur from the operations of either KOLT-FM or KOLT(AM).

10. TBC anticipates that the costs will be substantial for changing to KOLT-FM to operate on channel 239C3. Modifying KOLT-FM's operation to channel 239C3 will require a proof of performance of KOLT(AM)'s antenna system after the completion of all equipment changes. These engineering activities are necessitated by the location of KOLT-FM's FM antenna and the attendant concerns over interference with the KOLT(AM) directional antenna system. Based on discussion with its engineer and consultants, TBC estimates that the modification proposed by TSB II will cost approximately \$100,000.

11. Since the *Proposal* will require KOLT-FM, an existing station, to modify its operation to use a different channel, "it is well established Commission policy that licensees and/or permittees required to change channels so as to allow a new allotment elsewhere are entitled to reimbursement." *Brookville and Punxsutawney, Pennsylvania*, 65 RR2d 493, 495 ¶9 (1988) [citing *Circleville, Ohio*, 8 FCC2d 159 (1967)]. TBC understands that such reimbursement is limited to the extent that new equipment is actually required, that any equipment must be comparable to its existing equipment and that TBC cannot demand that TSB II pay for improving and modernizing KOLT-FM's facilities. *Circleville*, 8 FCC2d 159 at ¶12(a). The engineering and technical activities described above, however, are essential for modifying KOLT-FM to use channel 239C3 and do not include any enhancement or modernization of KOLT-FM's facilities. Thus, if the Commission approves the *Proposal*, TSB II or any successful applicant for the new Cheyenne allotment must reimburse TBC for the significant costs entailed by modifying KOLT-FM's operations.

12. These enormous costs also warrant the Commission's rejection of the *Proposal*. Although the *Proposal* states TSB II's intention to reimburse TBC for the reasonable expenses incurred in changing from channel 280C3 to 239C3 (*Proposal* ¶3), the *Proposal* does not

anticipate the considerable (and expensive) modifications necessary for changing KOLT-FM to channel 239C3 and the attendant disruption to KOLT-FM's operations. The *Proposal* does not recognize that KOLT-FM's antenna is side-mounted on one antenna of a standard broadcast station's multi-tower directional antenna system; instead the *Proposal* apparently assumes that KOLT-FM utilizes a conventional FM antenna and tower which can be modified at negligible cost. Thus, if TSB II still wishes to proceed with the *Proposal*, TSB II must comprehend the true extent and cost of its proposed modification to KOLT-FM's operations and must reiterate its willingness to pay those costs if the Commission adopts the *Proposal*. TBC should not be required to pay these costs because those costs result solely from the change in KOLT-FM's channel in order to allow the proposed new allotment and therefore must be reimbursed by TSB II. *Brookville*, 65 RR2d at 495 ¶9; *Circleville*, 8 FCC2d 159. In fact, if the *Proposal* is adopted, the Commission should direct TSB II to advance those costs rather than forcing TBC to incur the expense and hope for eventual reimbursement.

TBC's COUNTER-PROPOSAL

13. In accordance with Commission Rule 1.420(d) and *Notice* Appendix 3(a), TBC hereby presents a counter-proposal (the "*Counter-Proposal*"). TBC requests the Commission to amend the FM Table of Allotments, 47 C.F.R. §73.202(b), as follows:

<u>Community</u>	<u>Present Channels</u>	<u>Proposed New Channels</u>
Cheyenne, Wyoming	250C1, 260A, 264C1, 285A, 292C3	229A ³ , 250C1, 260A, 264C1, 285A, 292C3
Bridgeport, Nebraska	267C	239C3
Pine Bluffs, Wyoming	287C2	280C1
Gering, Nebraska	280C3	267C1

TBC has attached an Engineering Statement (Exhibit A) which demonstrates the advantages and feasibility of this *Counter-Proposal*. TBC intends to effectuate this *Counter-Proposal* promptly if it is adopted by the Commission.

14. There are no factors restricting the *Counter-Proposal*'s substitution of channel 267C1 for channel 280C3 at Gering. Indeed, the only broadcast licensee affected is TBC, and TBC submits that the public interest would be better served by the *Counter-Proposal*. This

³Assumes adoption of the unrelated proposal to allot channel 229A to Cheyenne. *Supra* ¶7.

substitution involves both changing and upgrading the KOLT-FM channel allotment, which KOLT-FM will ultimately accomplish by relocating its FM antenna to the KMOR(FM) tower located west of Scottsbluff, Nebraska.⁴ With this relocation and channel upgrade, KOLT-FM can reach its existing service area and provide a city grade contour over Gering without impacting other FM licensees and also expand its coverage from its new site to reach additional listeners, in furtherance of the public interest.

15. Similarly, substituting channel 239C3 in place of channel 267C at Bridgeport does not impact other licensees or permittees. To utilize channel 239C3, TBC's proposed Bridgeport station must locate its transmitting antenna 2 kilometers south of Bridgeport;⁵ with this antenna location, the Bridgeport station can provide a city grade contour over Bridgeport using channel 239C3. If the Commission adopts the *Counter-Proposal*, TBC will amend its application for the construction permit at Bridgeport to reflect a new antenna location meeting these requirements.

16. The *Counter-Proposal* also substitutes and upgrades the channel allotment for the unbuilt Pine Bluffs station. This new upgraded channel will allow the Pine Bluff station to use a TBC-owned transmitter tower located near Albin, Wyoming and thereby substantially expand the signal coverage distance of the Pine Bluffs station. Together with the *Counter-Proposal's* modifications to the Gering and Bridgeport channels, this modification of the Pine Bluffs channel will not impact other licensees or permittees.

17. As previously explained, TBC is the licensee at Gering, the permittee at Pine Bluffs, and the only applicant for Bridgeport. The *Counter-Proposal* also complies with the Commission's channel spacing requirements. Thus, this *Counter-Proposal* does not affect the channel allotment for any other licensee, permittee or applicant.

⁴Relocation of the KOLT-FM antenna to the KMOR Scottsbluff tower is not feasible under TSB II's Proposal. First, TBC's calculations show that channel 239C3 may not provide the required signal over Gering from the Scottsbluff tower. Second, TBC submits that use of channel 239C3 at the KMOR tower might interfere with KMOR's operations on channel 225C. Third, even this relocation will still entail greater expense than the typical FM channel substitution. Fourth, the Commission does not require a station to *involuntarily* relocate its transmitter site even though transmitter relocation represents the optimum result or would further a public interest objective. *Claremont, Locust Grove and Nowatta, Oklahoma, and Barling, Arkansas*, 64 RR2d 1714, 1716 ¶8 (1988). TBC observes that relocating KOLT-FM's antenna site will not accommodate both the *Proposal* and *Counter-Proposal*, so the exception to this anti-involuntary relocation policy described in *Rockport, Gregory, Alice and Armstrong, Texas*, 67 RR2d 176, 178 ¶10 (1989) does not apply.

⁵Or a location even further south or southwest of Bridgeport.

18. TBC's *Counter-Proposal* retains the current service areas for the Gering and Bridgeport stations, expands coverage for the Gering station, while substantially expanding the service area for the Pine Bluffs station. As shown in the attached Engineering Statement and diagrams, the expected population in the 1 mv/m contour region covered by the allotment of channel 280C1 to Pine Bluffs would increase from 38,792 persons to 54,293 persons, a 40% net service gain in this sparsely-populated rural area. Moreover, the *Counter-Proposal* will bring first full-time aural service to 300 people and bring second full-time aural service to another 2,017 people.⁶ By expanding the Pine Bluff station's service area and by bringing first and second full-time aural service to 2,300 additional persons, the *Counter-Proposal* would make radio service available to previously-neglected rural listeners and thereby further the public interest.

COMPARISON OF PROPOSAL AND COUNTER-PROPOSAL

19. Section 307(b) of the Communications Act directs the Commission to distribute radio frequencies among the several states and communities in a manner ensuring "a fair, efficient and equitable distribution of radio service". 47 U.S.C. §307(b). The Commission has interpreted this provision as promoting the following objectives:

- a. Some service of satisfactory signal strength to all areas of the country;
- b. As many program choices to as many listeners as possible; and
- c. Service of local origin to as many communities as possible.

In re Revision of FM Assignment Policies and Procedures, 90 FCC2d 88, 51 RR2d 807, 808-09 ¶ 3 (1982) (objectives of FM Allotment Table).

20. To achieve these policy objectives, the Commission established the following priorities for FM allotments:

- (1) First full-time aural service;
- (2) Second full-time aural service;
- (3) First local service; and
- (4) Other public interest matters.

⁶See Engineering Statement (Exhibit A) at 3 and Figure 3; on Figure 3, the handwritten numbers indicate the number of FM stations serving a particular region. The Engineering Statement explains that the AM stations in that region have drastically-reduced, if any, night-time service areas.

Blanchard, Louisiana and Stephens, Alabama, 2 CR 155 n.1 (1995) (citing *Revision of FM Assignment Policies*, 51 RR2d at 810 ¶7). When presented with competing proposals, the Commission selects the proposal serving the higher allotment priority.⁷ See *Revision of FM Assignment Policies*, 51 RR2d at 811 ¶13.

21. The TSB II *Proposal* raises only priority 4 (other public interest matters). Since Cheyenne already has 5 operating FM stations (plus other full-time AM stations), the *Proposal* does not achieve priorities 1 (first full-time aural service) or 2 (second full-time aural service). By proposing the seventh FM station in Cheyenne, the *Proposal* does not serve priority 3. Even under priority 4, the *Proposal* offers merely that it increase the number of stations in a community of 50,000 people with five existing stations. *Proposal* at ¶2.

22. In contrast, TBC's *Counter-Proposal* effectuates priorities 1, 2 and 4.⁸ The upgraded channel at Pine Bluffs will increase the reach of that station. This expanded signal coverage will provide first full-time aural service to 300 people in a 186 square kilometer area in Platte County, thereby serving priority 1. See Exhibit A at 3 & Figure 3. In addition, 2,017 people in a 1,555 square kilometer region located in Goshen and Platte counties will receive second full-time aural service (priority 2) under the *Counter-Proposal*. *Id.* Under priority 4, the *Counter-Proposal*: expands the Pine Bluffs coverage area and results in a 40% net service gain, creating more efficient use of the radio spectrum in accordance with Section 307(b); and increases the number of stations for a service area containing approximately 50,000 people. See Exhibit A.

23. The Commission's FM allotment policies confer a dispositive Section 307(b) preference to TBC's *Counter-Proposal*. By providing first full-time service to 300 people, the *Counter-Proposal* serves the Commission's most important priority. "[W]e continue to believe that greatest preference needs to be given to assuring the availability of at least one full-time radio service to as many people as possible." *Revision of FM Assignment Policies*, 51 RR2d at 810 ¶11. See, e.g., *Palmetto Communications Co.*, 68 RR2d 1570, 1573 ¶10 (Rev. Board 1991)

⁷Priorities (2) & (3) are given co-equal weight, *id.*, and when both proposals involve the same priority level, preference is accorded to the proposal serving the greater population. *Id.* at ¶ 10.

⁸TBC also observes that Gering, Pine Bluffs and Bridgeport allotments constitute the first local service for those communities, thereby implicating priority 3.

(dispositive preference awarded to first full-time service over addition to another community's existing multiple outlets); *Suburbanaire, Inc.*, 60 RR2d 1325, 1327 ¶2 (Rev. Bd. 1986); *Mighty-Mac Broadcasting Co.*, 58 RR2d 599, 603 ¶8 (Rev. Bd. 1985) (decisive preference to proposal providing first nighttime service to 1,000 more people and second nighttime service to 2,000 additional people). The *Counter-Proposal*'s provision of second full-time service to 2,017 additional people also constitutes a dispositive Section 307(b) preference. *See id.*

CONCLUSION

The Commission should reject TSB II's *Proposal* and adopt TBC's *Counter-Proposal*. TBC's *Counter-Proposal* will create a 40% net service gain for the Pine Bluffs station, maintain the existing coverage of the Gering and Bridgeport stations, bring first full-time aural service to 300 people and bring second full-time aural service to another 2,017 people. The *Proposal*, however, merely adds a seventh FM station to an already competitive urban market, and will entail enormous costs for modifying the channel for KOLT-FM. The *Counter-Proposal* serves higher allotment priorities than the *Proposal* and receives dispositive preferences under the Commission's policies and thus best effectuates the Section 307(b) statutory mandate. Accordingly, the Commission should adopt the *Counter-Proposal* in the public interest.

WHEREFORE, TBC respectfully requests that the Commission deny the Proposal presented by TSB II, grant TBC's Counter-Proposal, and amend the FM Table of Allotments, 47 C.F.R. §73.202(b), as requested in the Counter-Proposal.

Respectfully submitted May 19, 1997.

TRACY BROADCASTING CORPORATION

By:



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Attorneys for Tracy Broadcasting Corporation

City of

COUNTY OF DENVER)

AFFIDAVIT OF MICHAEL TRACY

MICHA

Subscribed and sworn to before me this 13th day of May, 1997, by

Subscribed and sworn
Michael J. Tracy

My Commission Expires: May 6, 2007

James R. Brewer
NOTARY PUBLIC

EXHIBIT A
ENGINEERING STATEMENT

ENGINEERING STATEMENT

This engineering statement has been prepared in support of comments being filed in MM Docket No. 97-106, RM-9071, In the Matter of Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations. (Cheyenne, Wyoming and Gering, Nebraska).

At the present time, Channel 287C2 is allotted to Pine Bluffs, Wyoming, which is mostly in a rural area. The expected population within the 1 mv/m Contour is 38,792 persons. The commentor and the applicant, should the Commission modify the allotments as proposed in these comments, presently owns a tower 8 kilometers North of Albin, Wyoming, which, if allocated as a C1, would put a City Grade Contour, 70 dbu, around Pine Bluffs, Wyoming. Since this tower is on high ground (formerly a microwave tower) it would be a considerable saving to the applicant to use an existing tower with higher power to serve this sparsely populated area economically. The expected population within the 1 mv/m Contour of a C1 from the Albin site is about 54,293 persons.

The Cheyenne/Gering Rule Making proposes a seventh local FM service to Cheyenne when actually the sixth service was only recently authorized.

These comments propose to further modify the allotments as the following:

City	Channel No.	
	Present	Proposed
Cheyenne, Wyoming	250C1, 260A, 264C1 285A, 292C3	229A, 250C1, 260A 264C1, 285A 292C3
Gering, Nebraska	280C3	267C1
Pine Bluffs, Wyoming	287C2	280C1
Bridgeport, Nebraska	267C	239C3

There are no restrictions to the allotment of Channel 267C1 to Gering in lieu of Channel 280C3. However, the allotment of Channel 239C3 to Bridgeport will require that the transmitting antenna location be 2 kilometers South of Bridgeport (in the area of the racetrack) or further South or Southwest (Reference Point: N. Lat. 41° 39' 00"; W. Lon. 103° 06' 30") . This area is more than adequate to provide a City Grade Contour over Bridgeport.

Attached as Figure 1 is a portion of a Sectional Aeronautical Chart showing the 70 DBU and 60 DBU Contours of a strategically located transmitter site for Pine Bluffs.

Attached as Figures 2A and 2B (2 parts) are a base map showing the 60 dbu Contours of a C1 station operating at the microwave tower location near Albin, Wyoming. Also shown on the map are the other aural services available within the proposed 60 DBU Contour. Figure 2C is a list of the AM and FM stations that cover some portions of the proposed 60 DBU Contour. The contours shown for the AM stations are the daytime 0.5 mv/m Contours. Some of the 0.5 mv/m Contours may be subject to objectionable interference. Furthermore, most of the AM stations have a very drastically reduced nighttime service area, if any at all. Therefore, Figure 3 is an exhibit of only FM Services which represent virtually the other aural services available at nighttime.

Based on Figures 2A and 2B there would be a minimum of six other daytime services within the C1 Primary Service Area in an area of 257 square kilometers with a population of about 672 persons.

Based on Figure 3 there would be an area in Platte County which has no Primary Nighttime Service Area. This area is approximately 186 square kilometers with a population of about 300 persons. Other areas have only one Primary Service Area which includes 1555 square kilometers with a population of 2017 persons.

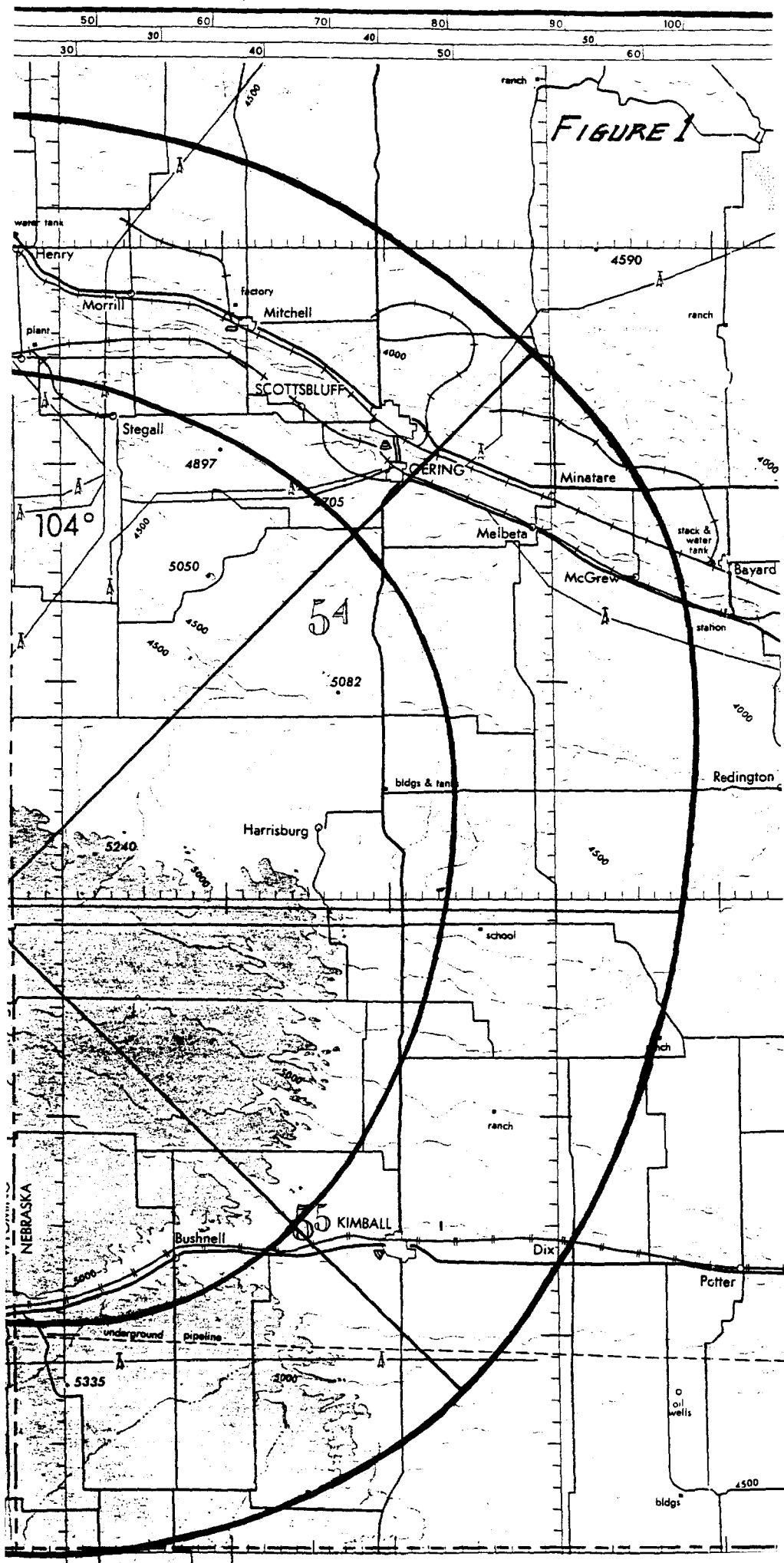
The basis of these comments is to demonstrate that the up-grading of the Pine Bluff allotment from a C2 to a C1 to make the Pine Bluff allotment economically viable as well as providing a first nighttime service to some areas as compared to a seventh service to Cheyenne.

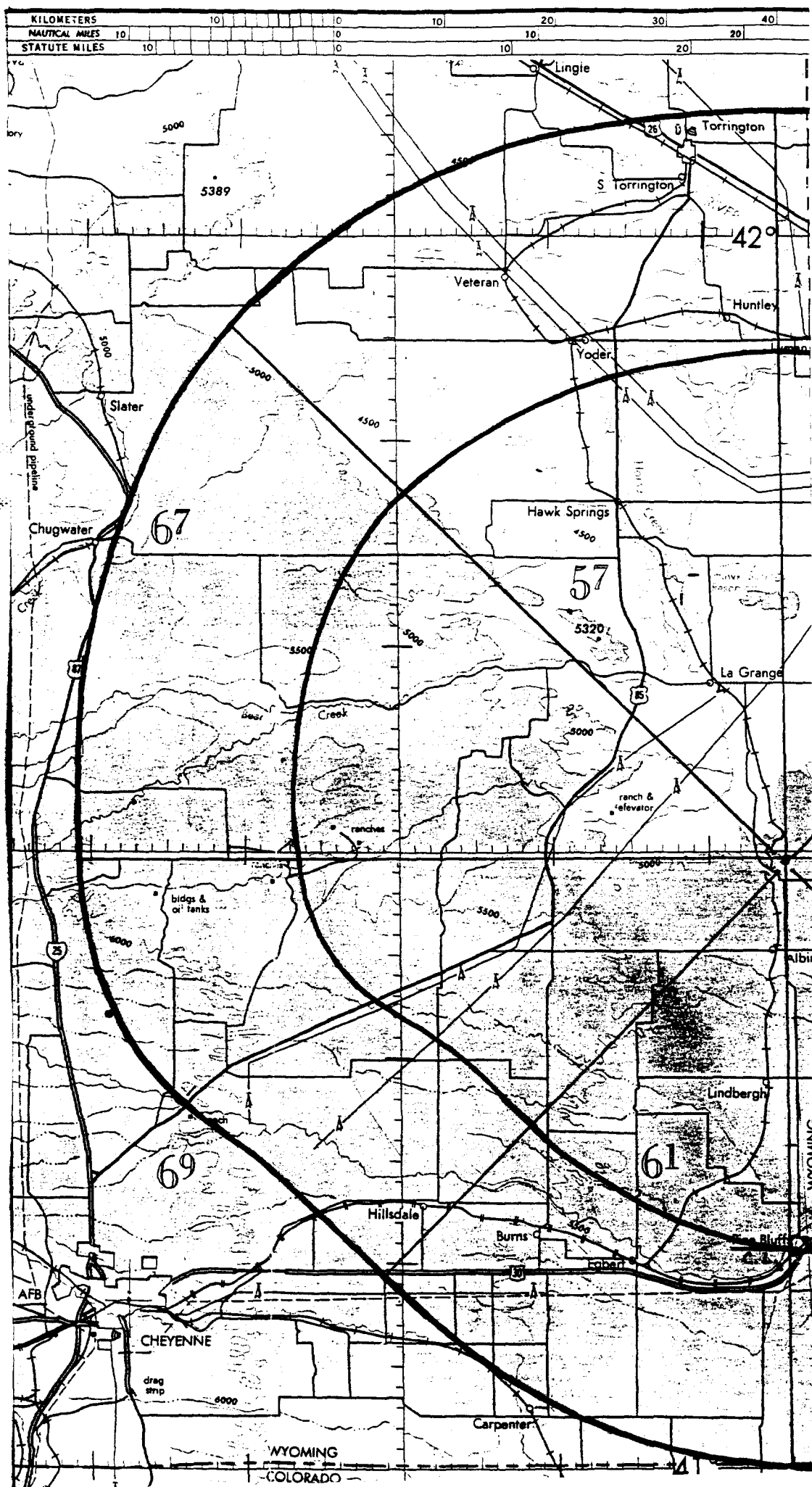
Respectfully submitted,

A handwritten signature in black ink, appearing to read "John E. Dettra, Jr.", written over the printed name.

John E. Dettra, Jr.

May 17, 1997





Map Center: 41-29-31 104-05-07
Scale = 1:620,000
May 8, 1997

WYOMING

ALBANY

LARAMIE

PINE BLUFFS, WY

0 10 20 30 40
miles
0 10 20 30 40 50
kilometers

Contours Overlapping
KOAQ(AM)
(not s

FIG. 2A

FIG. 2A

AM Interfering Stations

Call	Chan	City	State	
KLZ (LIC)	560	DENVER	CO	5 KW-U
KZMX (LIC)	580	HOT SPRINGS	SD	0.5 KW-D; 0.31 KW-N
KIIX (LIC)	600	WELLINGTON	CO	5 KW-D; 0.5 KW-N
KCSR (LIC)	610	CHADRON	NE	1 KW-D; 0.137KW-N
KHOW (LIC)	630	DENVER	CO	5 KW-U
*KGAB (LIC)	650	ORCHARD VALLEY	WY	8.5KW-D; 0.5 KW-N
*KOAQ (LIC)	690	TERRYTOWN	NE	1 KW-D; 0.064 KW-N
KNUS (LIC)	710	DENVER	CO	5 KW-U
KNUS (CP)	710	DENVER	CO	?
KUYO (LIC)	830	EVANSVILLE	WY	10 KW-Day Only
KOA (LIC)	850	DENVER	CO	50 KW-U
KPOF (LIC)	910	DENVER	CO	5 KW-D; 1 KW-N
KNEB (LIC)	960	SCOTTSBLUFF	NE	1 KW-D; 0.5 KW -N
KTWO (LIC)	1030	CASPER	WY	50 KW-U
KVVS (LIC)	1170	WINDSOR	CO	1 KW-Day Only
KLDI (LIC)	1210	LARAMIE	WY	10 KW-D; 1 KW-N
KFBC (LIC)	1240	CHEYENNE	WY	1 KW-U
KIMB (LIC)	1260	KIMBALL	NE	1 KW-D; 0.5 KW-N
KOWB (LIC)	1290	LARAMIE	WY	5 KW-D; 1 KW-N
KOLT (LIC)	1320	SCOTTSBLUFF	NE	5 KW-D; 1 KW-N
KSID (LIC)	1340	SIDNEY	NE	1 KW-U
KYCN (LIC)	1340	WHEATLAND	WY	0.25 KW-U
KJJL (LIC)	1370	CHEYENNE	WY	1 KW-D; 0.066 KW-N
KCOW (LIC)	1400	ALLIANCE	NE	1 KW-U
KRAE (LIC)	1480	CHEYENNE	WY	1 KW-D; 0.067 KW-N
KGOS (LIC)	1490	TORRINGTON	WY	1 KW-U
KJJL (CP)	1530	FOX FARM	WY	?

* These stations overlap the entire FM Allocation

FM Interfering Stations

Call	Chan	City	State
#KTNE-FM (LIC)	216	ALLIANCE	NE
#KUWR (LIC)	220	LARAMIE	WY
KMOR (LIC)	225	SCOTTS BLUFF	NE
KNEB-FM (LIC)	231	SCOTTS BLUFF	NE
KCGY (LIC)	236	LARAMIE	WY
KGLL (LIC)	241	GREELEY	CO
KGLL (CP)	241	GREELEY	CO
KCMI (LIC)	245	TERRYTOWN	NE
KIGN (LIC)	250	CHEYENNE	WY
KERM (LIC)	252	TORRINGTON	WY
KSID-FM (LIC)	254	SIDNEY	NE
KUAD-FM (LIC)	256	WINDSOR	CO
KRRR (CP)	260	CHEYENNE	WY
NEW (CP)	261	KIMBALL	NE
KOLZ (LIC)	264	CHEYENNE	WY
KMUS-FM (LIC)	270	BURNS	WY
KPNY (LIC)	271	ALLIANCE	NE
KRQU (LIC)	275	LARAMIE	WY
KOLT-FM (LIC)	280	GERING	NE
KASX (CP)	287	PINE BLUFFS	WY
KAAQ (LIC)	290	ALLIANCE	NE

#Non-Commercial Stations.

CERTIFICATE OF SERVICE

I hereby certify that on May 19, 1997, I gave a true and correct copy of the foregoing ANSWER TO ORDER TO SHOW CAUSE AND COMMENTS OF TRACY BROADCASTING CORPORATION ("ANSWER") in the U.S. mail, postage prepaid, addressed to the following:

William F. Caton, Acting Secretary (by hand delivery)
Federal Communications Commission
1919 M Street, N.W., Washington D.C. 20554

Sharon P. McDonald
Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W., Washington D.C. 20554

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